

United Brine Services, LLC

4800 San Felipe
Houston, Texas 77056

713-877-2700

July 21, 2010

Mr. Stephen Platt
Ground Water & Enforcement Branch (3WP22)
Office of Drinking Water and Source Water Protection
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Re: Texas Brine Company Saltville, LLC
Permit # VAS3G931BSMY
November 8, 2007
Proposed Amendment of Permit

Dear Mr. Platt:

In April we had discussed with you briefly our desire to add one or more wells to our UIC permit at Saltville to supplement our brine production capability. Our immediate goal is to re-enter the Well 131 stratigraphic test drilled in 1996 and subsequently plugged and abandoned in 2002.

We plan to re-enter the Well 131; remove the existing 4-1/2" casing; cut a window in the 9-5/8" cemented casing at or about the depth of 3350' and drill a horizontal borehole connection over to and intercept our existing Well 1A cavern. I have included a schematic to illustrate our plan of action.

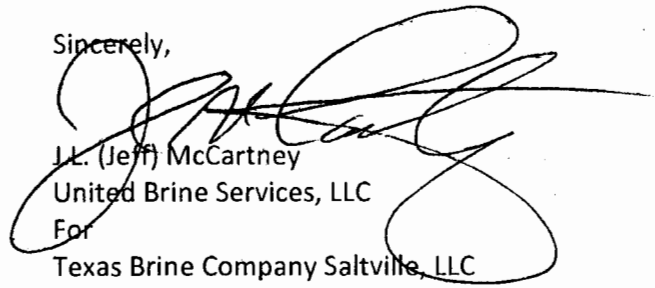
As we also discussed, one of our currently permitted wells (Well # 15) is no longer in active service and we have no immediate plans to reactivate the well. We are presently authorized to inject fluids through six (6) Class III G injection wells according to our permit. Currently we are producing Wells 1A, 13 and 14. We are currently working on Well 9 and 17 and hope to have these two wells in production within the next month. Since we no longer have a use for Well 15, we seek your authorization to substitute Well 131 in the place of Well 15 which would then give us our six allowable wells.

Once we make the horizontal connection between Well 131 and Well 1A, we plan to operate these two wells in a gallery system under the same permit conditions as we are currently operating gallery Wells 13 and 14 and soon to be operating gallery Wells 9 and 17.

I have attached a plat illustrating the location of Wells 1A and 131 within our facility outline.

Your timely attention to this request would be greatly appreciated. Should you require additional information, please let me know.

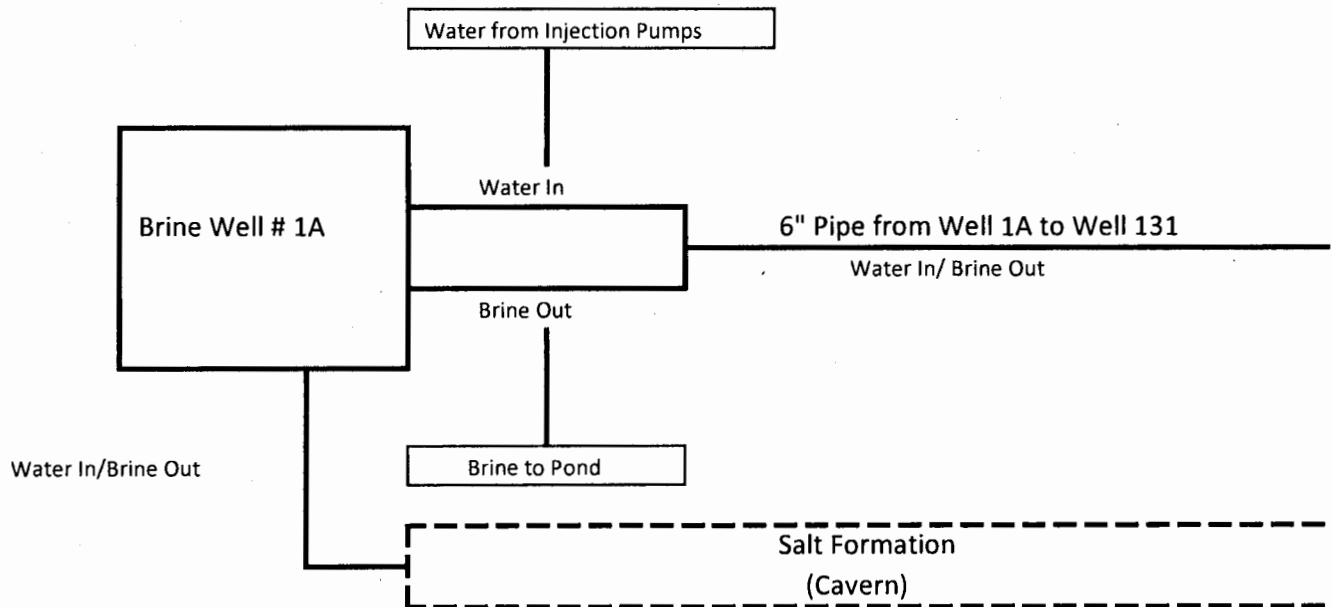
Sincerely,

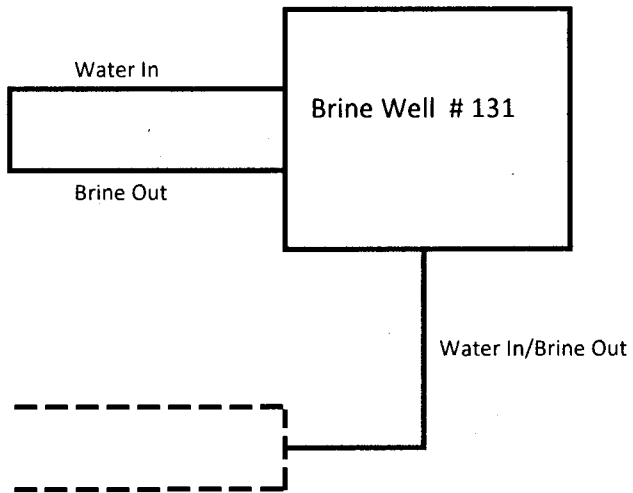
A large, stylized handwritten signature in black ink, appearing to read 'J.L. McCartney', is written over the typed name and company information.

J.L. (Jeff) McCartney
United Brine Services, LLC
For
Texas Brine Company Saltville, LLC

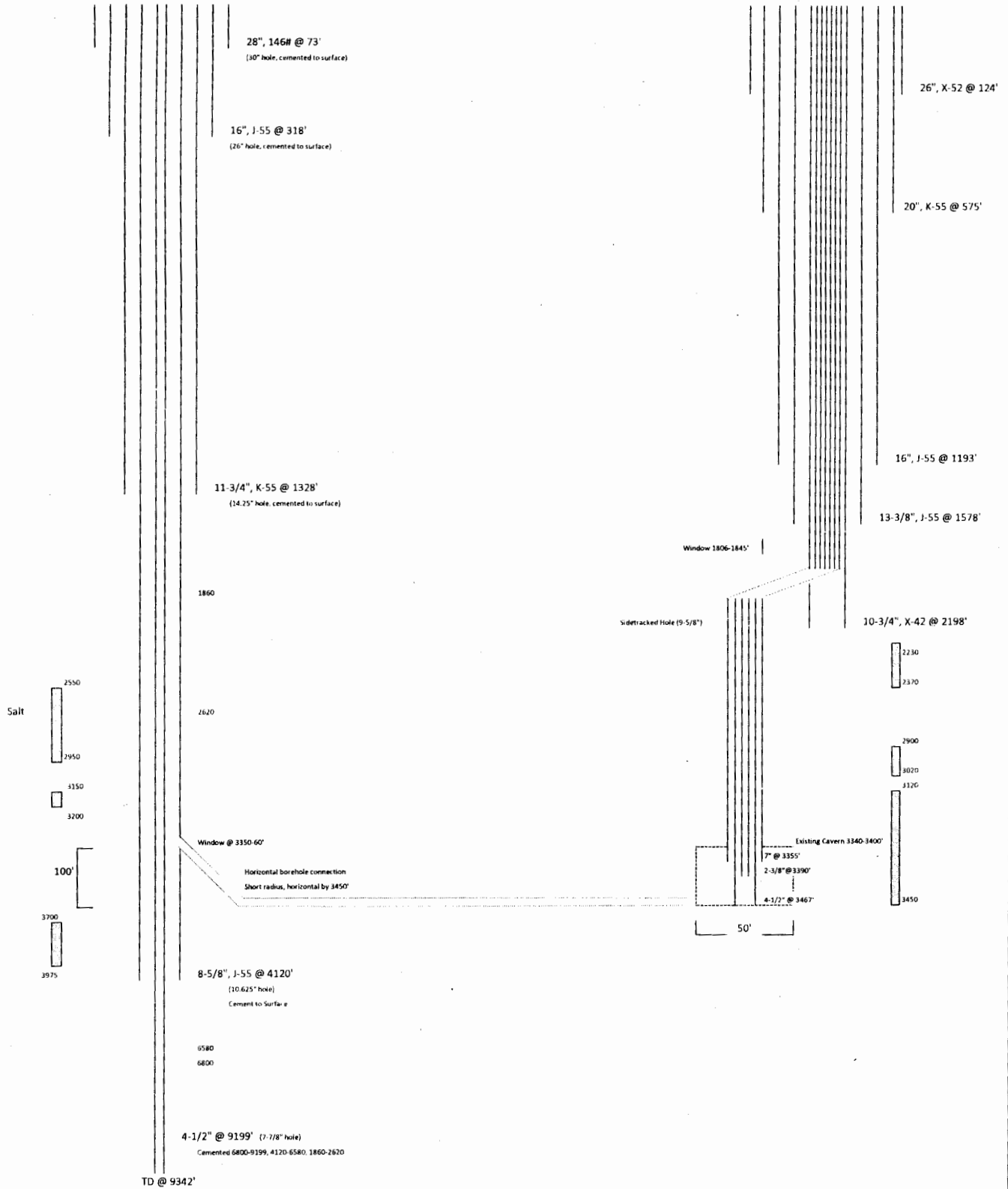
attachment: area map
 borehole schematic

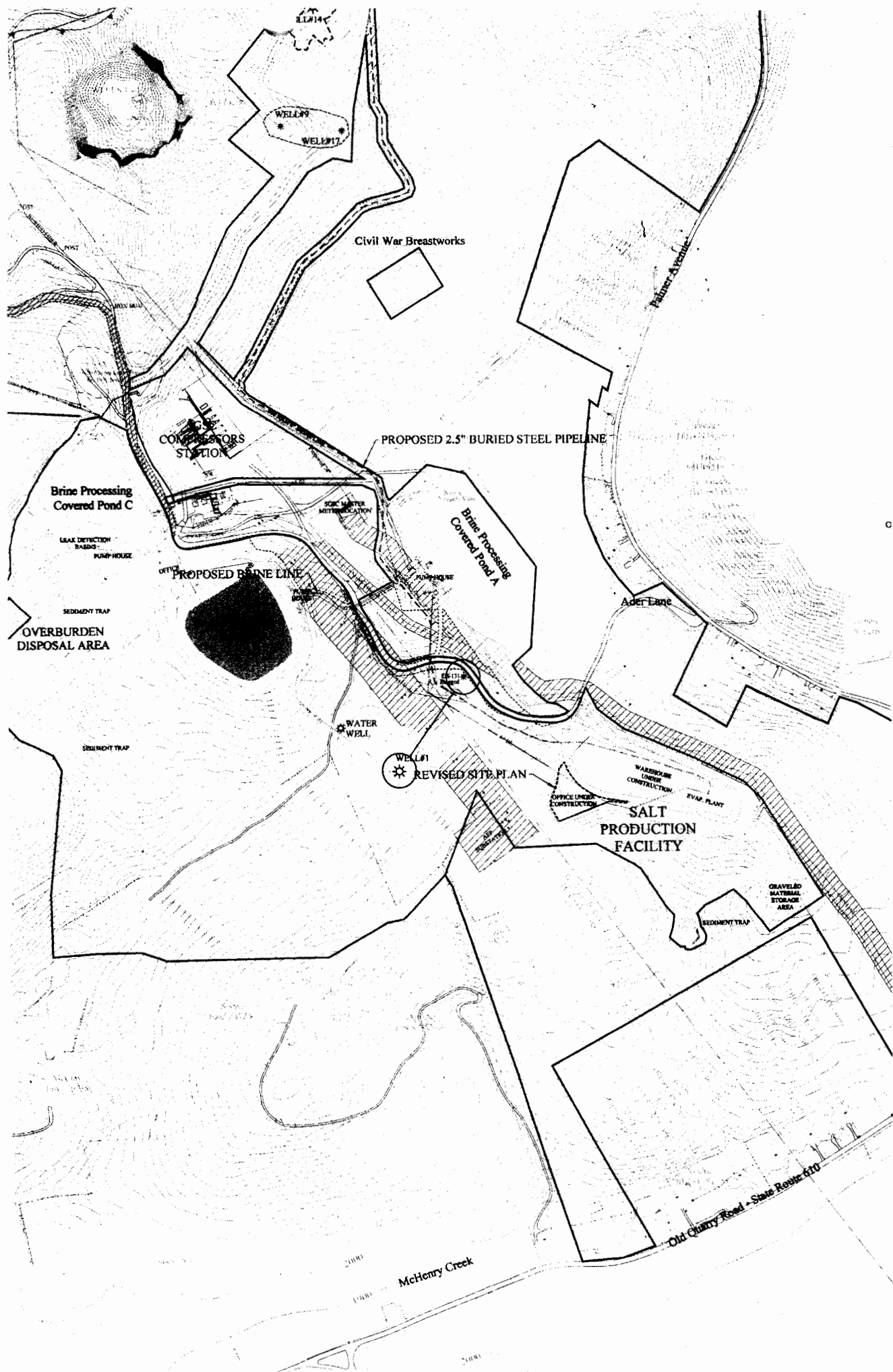
BRINE WELL 1A to Brine Well 131 PIPING SCHEMATIC

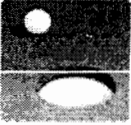





650'







Re: Saltville UIC Permit 
Steve Platt to: Jeff McCartney
Cc: James Bennett, Dave Rectenwald

08/11/2010 02:28 PM

Jeff,

Just wanted to follow up on the discussion we had several weeks ago on your proposal to add Well 131 as an injection well under the permit. As we discussed, since Well 15 was originally one of the six injection wells constructed and inventoried under the permit (only six wells were permitted under the permit), and you no longer plan to use Well 15, this well will need to be plugged and abandoned in order to allow Well 131 to be one of the six injection wells under the permit. In addition, we discussed the need to conduct mechanical integrity testing on Well 9 and Well 17 once those wells are completed as well as Well 131 once that well is constructed. In the future if additional injection wells are proposed for the facility, Texas Brine will need to submit a major modification to the current permit or submit a new permit for any new development.

Please keep us updated on the current progress of the injection well development at the facility and please provide us with sufficient notification prior to the testing of the wells. Thank you.

S. Stephen Platt
U.S. EPA, Region 3
Ground Water & Enforcement Branch (3WP22)
1650 Arch Street
Philadelphia, PA 19103
215-814-5464

Jeff McCartney

Please see attached letter and exhibits requesti...

07/21/2010 04:39:23 PM

From: Jeff McCartney <jmccartney@unitedbrine.com>
To: Steve Platt/R3/USEPA/US@EPA
Date: 07/21/2010 04:39 PM
Subject: Saltville UIC Permit

Please see attached letter and exhibits requesting addition of Well 131 to our permit. Your timely response would be appreciated. Thanks

[attachment "Casing Schematic.xls" deleted by Steve Platt/R3/USEPA/US] [attachment "Piping Schematic.xls" deleted by Steve Platt/R3/USEPA/US] [attachment "Platt1ltr.pdf" deleted by Steve Platt/R3/USEPA/US] [attachment "AmendVMap.pdf" deleted by Steve Platt/R3/USEPA/US]